



Air Quality
TIER I OPERATING PERMIT
State of Idaho
Department of Environmental Quality

PERMIT No.: T1-040040
FACILITY ID No.: 027-00064
AQCR: 64 **CLASS:** A
SIC: 3715 **ZONE:** 11
UTM COORDINATE (km): 524.0, 4837.8

1. PERMITTEE
Western World, Inc. Circle J Trailers

2. PROJECT
Tier 1 Operating Permit Renewal

3. MAILING ADDRESS 200 N. Kit Avenue	CITY Caldwell	STATE ID	ZIP 83605
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4. FACILITY CONTACT Sharon Deeds	TITLE Coordinator	TELEPHONE (208) 459-0842
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5. RESPONSIBLE OFFICIAL Robert A. Bushnell, Jr.	TITLE President	TELEPHONE (208) 459-0842
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6. EXACT PLANT LOCATION Bordering Kit Avenue and Simplot Blvd., Caldwell, Idaho	COUNTY Canyon
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7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Horse and utility trailer manufacturing

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page. This Tier I operating permit replaces Tier I Operating Permit No. 027-00064, issued December 15, 2000, the terms and conditions of which shall no longer apply.

DATE ISSUED:	Public Comment Draft
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TONI HARDESTY, DIRECTOR DEPARTMENT OF ENVIRONMENTAL QUALITY	DATE EXPIRES: XXXXXXXXXX
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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. TIER I OPERATING PERMIT SCOPE	4
2. FACILITY-WIDE CONDITIONS	7
3. BUILDING #2 – FIBERGLASS ROOF MANUFACTURING.....	14
4. BUILDING #5 – PAINTING OPERATIONS.....	17
5. INSIGNIFICANT ACTIVITIES.....	21
6. TIER I OPERATING PERMIT GENERAL PROVISIONS	22

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
Btu/hr	British thermal unit per hour
CAA	Clean Air Act
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gal/day	gallons per day
gr	grain (1 lb = 7,000 grains)
HVLP	high volume low pressure
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/day	pounds per day
lb/mo	pounds per month
km	kilometer
m	meter(s)
mg/m ³	1x 10 ⁻³ gram per cubic meter
O&M	Operations and maintenance
PM	particulate matter
PTC	permit to construct
SIC	Standard Industrial Classification
TAP	toxic air pollutant
T/yr	tons per year
µg/m ³	micrograms per cubic meter
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

1. TIER I OPERATING PERMIT SCOPE

Purpose

- 1.1 The purpose for this Tier I operating permit is to renew the facility's existing Tier I operating permit, which was issued December 15, 2000. The facility has not modified during the term of its existing Tier I operating permit.
- 1.2 This Tier I operating permit renewal replaces Tier I Operating Permit No. 027-00064, issued December 15, 2000, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.3 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

Table 1.1 REGULATED SOURCES

Permit Section	Source Description		Emissions Control(s)
2	<u>Natural Gas-fired Space Heaters and Hot Water Heaters</u> <ul style="list-style-type: none"> •Building #2-fiberglass manufacturing: six natural gas-fired space heaters, each has a heat input rate of 16,000 Btu/hr •Building #3- metal fabrication: seven natural gas-fired space heaters, each has a heat input rate of 16,000 Btu/hr •Building #3- additional metal fabrication: six natural gas-fired space heaters, each has a heat input rate of 250,000 Btu/hr •Building #4- metal fabrication: seven natural gas-fired space heaters, each has a heat input rate of 16,000 Btu/hr •Building #5- painting: seven natural gas-fired space heaters, each has a heat input rate of 16,000 Btu/hr •Building #5- painting: two natural gas-fired water heaters, each has a heat input rate of 600,000 Btu/hr <u>A one million Btu/hr natural gas-fired burner.</u> <u>Welding</u> Annual welding rod throughput is around 10 T/yr. This value equates to 0.03 T/day assuming continuous operation.		None
3	<u>Building #2, Fiberglass Roof Manufacturing</u>	Chop Booth	HVLP guns with transfer efficiency of around 65%. A combination of particulate and carbon filters. Particulate filters have a removal efficiency of greater than 90%. The carbon filters remove about 35% of VOCs.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Permit Section	Source Description		Emissions Control(s)
		Gel Coating Booth	Same as that described for the chop booth

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

4	<u>Building #5, Painting Operations</u>	Prime Booth	HVLP guns with transfer efficiency of around 65%. A combination of particulate and carbon filters. Particulate filters have a removal efficiency of greater than 90%. The carbon filters remove about 35% of VOCs.
		Cut-in Booth	HVLP guns are used. A series of filter banks located on the interior walls that run the length of booth. There are 16 filter banks per wall.
		Top Coat Booth	HVLP guns are used. A series of filter banks located on the interior walls that run the length of booth. There are 11 filter banks per wall.
		Repair Booth	A combination of particulate and carbon filters. Particulate filters have a removal efficiency of greater than 90%. The carbon filters remove about 35% of VOCs.
		Heat Booth	None

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive Dust	Reasonable Control	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.11
2.5	Odors	Reasonable Control	IDAPA 58.01.01.775-776	2.6, 2.11
2.7	Opacity	20% for no more than three minutes in any 60 minute period	IDAPA 58.01.01.625	2.8, 2.11
2.13	PM	0.015 gr/dscf @ 3% O ₂ for gas	IDAPA 58.01.01.676-677	None
2.18	Facility-wide VOC	150 tons per any consecutive 12 month period (150 T/yr)	PTC #027-00064, 4/30/99	See Section 3 and 4

Fugitive Dust

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive dust emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

- 2.9.1 The person responsible for, or in charge of a facility during an excess emissions event, shall with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event, to reduce the frequency of occurrence of such events, to minimize the amount by which the emission standard is exceeded, and shall, as provided below or upon request of DEQ, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

- 2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

- 2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

- 2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01 and 02, 3/20/97]

2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

2.9.5.1 An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

2.9.5.2 Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

Performance Testing

2.10 If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 Fax: (208) 373-0287

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Monitoring and Recordkeeping

- 2.11 The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

Reports and Certifications

- 2.12 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 Fax: (208) 373-0287

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

Fuel-Burning Equipment

- 2.13 The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, or 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid.

[IDAPA 58.01.01.676-677, 5/1/94]

Open Burning

- 2.14 The permittee shall comply with IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

[IDAPA 58.01.01.600-616, 4/5/00]

Renovation/Demolition

- 2.15 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.16 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 68.215(a)(ii)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Recycling and Emissions Reductions

- 2.17 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.
[40 CFR 82, Subpart F]
- 2.18 The annual facility-wide emissions of volatile organic compounds (VOCs) shall not exceed 150 tons per any consecutive 12-month period (150 T/yr).
[PTC Condition]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040				
Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

3. BUILDING #2 – FIBERGLASS ROOF MANUFACTURING

Summary Description

Table 3.1 describes the devices used to control emissions from building #2 – fiberglass roof manufacturing.

Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Chop Booth	HVLP guns with transfer efficiency of around 65%. A combination of particulate and carbon filters. Particulate filters have a removal efficiency of greater than 90%. The carbon filters remove about 35% of VOCs
Gel Coating Booth	Same as that described for the chop booth

Table 3.2 contains only a summary of the requirements that apply to the building #2 – fiberglass roof manufacturing. Specific permit requirements are listed below Table 3.2.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
3.1	Opacity	20% for no more than three minutes in any 60 minute period	IDAPA 58.01.01.625 Permit to Construct (PTC) #027-00064, 4/30/99	3.3, 3.4, 3.5 & 3.7
3.2	Facility-wide VOCs	150 tons per any consecutive 12-month period (150 T/yr)	PTC #027-00064, 4/30/99	3.6

Permit Limits / Standard Summary

- 3.1 The permittee shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in the IDAPA 58.01.01.625.
- [PTC Condition]**
- 3.2 Annual facility-wide VOC emissions shall not exceed the annual VOC emission rate limit specified in Section 2.18 of this permit.
- [PTC Condition]**

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Operating Requirements

- 3.3 The permittee shall develop an Operations and Maintenance (O&M) Manual for all booth filtration systems. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit are at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintained in good working order and operated as efficiently as practicable to meet the manufacturer's air pollution control device specifications. This manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC Condition]

- 3.4 The pressure drop across the filtration systems shall be maintained within the manufacturer's and O&M Manuals specifications. Documentation of the operating pressure drop specifications for the filtration systems shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC Condition]

- 3.5 Filters for the filtration systems for the fiberglass roof manufacturing processes in Building #2 shall be checked and replaced as outlined in the O&M Manual's specifications. Documentation of the filter replacement shall remain on-site at all times and shall be made available to DEQ representatives upon request.

[PTC Condition]

Monitoring and Recordkeeping Requirements

- 3.6 The permittee shall calculate and record the VOC emissions from the Building #2 fiberglass processes on a monthly and annual basis using the equations below. Building #2 VOC emissions shall be added to Building #5 VOC emissions to demonstrate compliance with the annual VOC emission rate limit. The most recent five years' compilation of records shall be kept on-site, in records, and shall be made available to DEQ representatives upon request. Records shall include, but not be limited to, an explanation of the calculation methods, sample calculations, product usage rates, Material Safety Data Sheets, and product VOC concentration. Product shall include, but not be limited to, paints, primers, solvents, cleaners, resins, gel coats, and catalysts.

3.6.1 Monthly VOC Emission Determination Equation

$$VOC_m = \sum_{i=1}^n (X_i * Y_i)$$

Where:

VOC _m	=	monthly VOC emission rate (lb/mo)
X _i	=	VOC content of product i (% by weight)
Y _i	=	weight of product i used per month (lb/mo)
n	=	number of product i used

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-040040				
Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

3.6.2
Annual VOC Emission Determination Equation

$$VOC_a = (\sum_{i=1}^n (VOC_m)_i) / 2000$$

Where:

VOC_a

=

annual VOC emission rate (T/yr)

(VOC_m)_i

=

monthly VOC emission rate for month i

n

=

number of months

[PTC Condition]

3.7
The permittee shall monitor and record the pressure drop across the filtration systems on a weekly basis. The most recent five years compilation of records shall be kept on-site, in records, and shall be made available to DEQ representatives upon request.

[PTC Condition]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

4. BUILDING #5 – PAINTING OPERATIONS

Summary Description

Table 4.1 describes the devices used to control emissions from building #5 – painting operations

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s) / Process(es)	Emissions Control Device
Prime Booth	HVLP guns with transfer efficiency of around 65%. A combination of particulate and carbon filters. Particulate filters have a removal efficiency of greater than 90%. The carbon filters remove about 35% of VOCs.
Cut-in Booth	HVLP guns are used. A series of filter banks located on the interior walls that run the length of booth. There are 16 filter banks per wall.
Top Coat Booth	HVLP guns are used. A series of filter banks located on the interior walls that run the length of booth. There are 11 filter banks per wall.
Repair Booth	A combination of particulate and carbon filters. Particulate filters have a removal efficiency of greater than 90%. The carbon filters remove about 35% of VOCs
Heat Booth	None

Table 4.2 contains only a summary of the requirements that apply to building #5 – painting operations. Specific permit requirements are listed below Table 4.2.

Table 4.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
4.1	Opacity	20% for no more than three minutes in any 60- minute period	IDAPA 58.01.01.625 PTC #027-00064, 4/30/99	4.5, 4.6, 4.7, 4.10
4.2	Facility-Wide VOCs	150 tons per any consecutive 12-month period (150 T/yr)	PTC #027-00064, 4/30/99	4.11
4.3	TAPs Non-Carcinogenic Increments.	Daily product usage limit established using Eq. indicated in 4.3.1	PTC #027-00064, 4/30/99 state only requirement	4.8, 4.12
4.4	TAPs Carcinogenic Increments.	Daily product usage limit established using Eq. indicated in 4.4.1	PTC #027-00064, 4/30/99 state only requirement	4.9, 4.12

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Permit Limits / Standard Summary

4.1 No person shall discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625 *Rules for the Control of Air Pollution in Idaho*.
[PTC Condition]

4.2 Annual facility-wide VOC emissions shall not exceed the annual VOC emission rate limit specified in section 2.18 of this permit.
[PTC Condition]

4.3 The daily emission limits (pounds per day [lb/day]) for individual non-carcinogenic toxic air pollutants (TAPs) shall be determined by using the following equation:

4.3.1 Non-carcinogenic TAP Determination Equation

$$E = S/0.006$$

Where:

E = the total allowable daily emissions in pounds (lb/day)
S = Standard, 24-hour acceptable ambient concentration in milligrams per cubic meter (mg/m³) from IDAPA 58.01.01.585
0.006 = factor which includes the normalized modeling results and conversion factors

The 24-hour non-carcinogenic TAP emissions can not exceed the daily limits which shall be determined using the equation indicated in 4.3.1.

[PTC Condition (state-only)]

4.4 The daily emission limits (pounds per day [lb/day]) for individual carcinogenic TAPs shall be determined using the following equation:

4.4.1 Carcinogenic TAP Determination Equation

$$E = S*0.92$$

Where:

E = the total allowable daily emissions in pounds (lb/day)
S = Standard, [annual] acceptable ambient concentration for carcinogens in micrograms per cubic meter (µg/m³) from IDAPA 58.01.01.586
0.92 = factor which includes the normalized modeling results and conversion factors

The carcinogenic TAP emissions can not exceed the daily limits which are determined using the equation indicated in 4.4.1.

[PTC Condition (state-only)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Operating Requirements

- 4.5 The permittee shall develop an Operations and Maintenance (O&M) Manual for all booth filtration systems. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit are at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintained in good working order and operated as efficiently as practicable to meet the manufacturer's air pollution control device specifications. This manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.
[PTC Condition]
- 4.6 The pressure drop across the filtration systems shall be maintained within the manufacturer's and O&M Manuals specifications. Documentation of the operating pressure drop specifications for the filtration systems shall remain on-site at all times and shall be made available to DEQ representatives upon request.
[PTC Condition]
- 4.7 Filters for the filtration systems for all painting operations in Building #5 shall be checked and replaced as outlined in the O&M Manual's specifications. Documentation of the filter replacement shall remain on-site at all times and shall be made available to DEQ representatives upon request.
[PTC Condition]
- 4.8 The permittee shall use the equation indicated in 4.3.1 to generate a list of daily emission rate limits for the TAPs emitted in the Building #5 finishing processes for which a standard in IDAPA 58.01.01.585 applies. Using these emission limits, the permittee shall establish a list of daily product limits (gallons per day [gal/day]) for each non-carcinogenic TAP containing products in the Building #5 finishing process (e.g. paints, primers, etc.). These limitations shall assure that the daily combined product usage will not cause an exceedance of the emissions limits established using the equation indicated in 4.1.3. The product usage limits must be developed prior to each day's operations. The same list may be used day after day so long as it accounts for all the non-carcinogenic TAP containing products used. The daily products usage limits list shall be made available to DEQ representatives upon request.
[PTC Condition (state-only)]
- 4.9 The permittee shall use the equation indicated in 4.4.1 to generate a list of daily emission rate limits for the TAPs emitted in the Building #5 finishing processes for which a standard in IDAPA 58.01.01.586 applies. Using these emission limits, the permittee shall establish a list of daily product limits (gallons per day [gal/day]) for each carcinogenic TAP-containing product in the Building #5 finishing process (e.g. paints, primers, etc.). These limitations must assure that the daily combined product usage will not cause an exceedance of the emissions limits established using the equation indicated in 4.4.1. The product usage limits must be developed prior to each day's operations. The same list may be used day after day so long as it accounts for all the carcinogenic TAP containing products used.
[PTC Condition (state-only)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Monitoring and Recordkeeping Requirements

- 4.10 The Permittee shall monitor and record the pressure drop across the filtration systems on a weekly basis. The most recent five years compilation of records shall be kept on-site, in records, and shall be made available to DEQ representatives upon request.

[PTC Condition]

- 4.11 The permittee shall calculate and record the VOC emissions from the Building #5 finishing processes on a monthly and annual basis using the equations below. Building #5 VOC emissions shall be added to Building #2 VOC emissions to demonstrate compliance with the annual VOC emission rate limit. The most recent five years' compilation of records shall be kept on-site, in records, and shall be made available to DEQ representatives upon request. Records shall include, but not be limited to, an explanation of the calculation methods, sample calculations, product usage rates, Material Safety Data Sheets, and product VOC concentration. Product shall include, but not be limited to, paints, primers, solvents, and cleaners.

4.11.1 Monthly VOC Emission Determination Equation

$$VOC_m = \sum_{i=1}^n (X_i * Y_i)$$

Where:

VOC_m = monthly VOC emission rate (lb/mo)
 X_i = VOC content of product i (% by weight)
 Y_i = weight of product i used per month (lb/mo)
 n = number of product i used

4.11.2 Annual VOC Emission Determination Equation

$$VOC_a = (\sum_{i=1}^n (VOC_m)_i) / 2000$$

Where:

VOC_a = annual VOC emission rate (T/yr)
 $(VOC_m)_i$ = monthly VOC emission rate for month i
 n = number of months

[PTC Condition]

- 4.12 The permittee shall monitor and record the daily usage of each non-carcinogenic and carcinogenic, if applicable, TAP-containing product in the Building #5 finishing process to demonstrate compliance with the product usage limits established by Sections 4.3 and 4.4 of this permit. The daily product usage shall be recorded in records; the most recent two years' compilation of which shall be kept on-site and shall be made available to DEQ representatives upon request. Records shall include an explanation of the calculation methods as well as a sample calculation.

[PTC Condition (state-only)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

5. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 5.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Natural Gas-Fired Space Heaters; 6 Total	317.01.b.i.(18)
Natural Gas-Fired Space Heaters; 13 Total	317.01.b.i.(18)
Natural Gas-Fired Space Heaters; 7 Total	317.01.b.i.(18)
Natural Gas-Fired Space Heaters; 7 Total	317.01.b.i.(18)
Natural Gas-Fired Hot Water Heaters; 2 Total	317.01.b.i.(18)
Natural Gas-Fired Burner (Heat Booth)	317.01.b.i.(5)
Welding	317.01.b.i.(5)
Storage Tanks	317.01.a.i.(4)
Wax Application	317.01.a.i.(27)
Portable Drums and Totes	317.01.a.i.(37)
Grinding and Buffing	317.01.a.i.(49)
Cutting Torches	317.01.a.i.(12)
Paint Kitchen	317.01.a.(4)

- 5.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

6. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

8. Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i and 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15); 40 CFR 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Clean Air Act section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a “state-only” provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source’s potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a “state-only” provision are enforceable only in accordance with state law. “State-only” provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- 14.1 Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- 14.2 Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- 14.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 14.4 As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Registration and Registration Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03]

Certification

17. All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 18.1 The owner or operator of a Tier I source shall submit an application to DEQ for a renewal of this permit at least 6 months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application 9 months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

- 18.2 If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

- 19.1 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- 19.1.1 Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- 19.1.2 DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- 19.2 The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- 19.3 Nothing in this permit shall alter or affect the following:
- 19.3.1 Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- 19.3.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 19.3.3 The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- 19.3.4 The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

**[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, and 325, 5/1/94;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, and 385.03, 3/19/99; 40 CFR 70.6(f)]**

Compliance Schedule and Progress Reports

- 20.1 For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- 20.2 For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- 20.3 For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

- 20.4 For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9 and 10, 5/1/94;
40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
- 21.1 The permittee's reporting period for annual compliance certifications for all emissions units shall be from November 1st to October 31 of each year. The compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA within 30 days of the end of the specified reporting period.
- 21.2 The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- 21.3 The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- 21.3.1 The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- 21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit.
- 21.3.3 The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Paragraph 21.3.2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR 64 occurred;
- 21.3.4 Such other facts as DEQ may require to determine the compliance status of the source.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended;
62 Fed. Reg. 54900 and 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: TI-040040

Permittee:	Western World, Inc. Circle J Trailers	Facility ID No. 027-00064	Date Issued:	Public Comment Draft
Location:	Caldwell, Idaho		Date Expires:	XXXXXX

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from November 1 to April 30 and May 1 to October 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]